

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

Mahmoud KHALIL,

Petitioner,

v.

Donald J. TRUMP, in his official capacity as President of the United States; William P. JOYCE, in his official capacity as Acting Field Office Director of New York, Immigration and Customs Enforcement; Caleb VITELLO, Acting Director, U.S. Immigration and Customs Enforcement; Kristi NOEM, in her official capacity as Secretary of the United States Department of Homeland Security; Marco RUBIO, in his official capacity as Secretary of State; and Pamela BONDI, in her official capacity as Attorney General, U.S. Department of Justice,

Respondents.

Case No. 25-cv-01935


DECLARATION OF LAURA RODRIGUEZ

I, Laura Rodriguez, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. My name is Laura Rodriguez. I am a licensed attorney in good standing in the state of New York.
2. I am a Supervising Attorney for the Immigrant Rights Detention Program with the American Friends Service Committee in New Jersey.
3. Our program provides pro bono legal services to individuals detained at Elizabeth Detention Center (“EDC”) in Elizabeth, New Jersey. Our attorneys represent individuals in immigration proceedings at EDC.
4. We conduct intakes on a weekly basis at EDC. We conducted weekly intake on March 13, 2025. Before that, we last conducted intake on March 6, 2025.
5. During intake, it is a regular practice of our program to document the date of arrival for each person detained at EDC.
6. I have reviewed our internal records and can affirm that on March 13, 2025, we conducted intake with at least four individuals who were processed for detention at EDC between March 6, 2025 and March 13, 2025.
7. Three of those individuals reported arriving at EDC on March 6, 2026.
8. One individual reported arriving at EDC on March 10, 2025.

9. I hereby affirm that the above statements are true and correct to the best of my knowledge.

Executed on March 17, 2025
New York, New York



Laura Rodriguez
Supervising Attorney
American Friends Service Committee
Immigrant Rights Detention Program